



U.S. Department of Justice

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District of New Jersey*

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May 8, 2020

Filed Via ECF

The Honorable Claire C. Cecchi
United States District Judge
Martin Luther King Jr. Federal Building and U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: *United States v. Matthew Brent Goettsche, et al.*,
Crim. No. 19-877

Your Honor:

The United States of America, through the undersigned, respectfully requests that the Court enter the proposed complex case order and continuance order to extend the Speedy Trial Act deadlines through July 15, 2020.

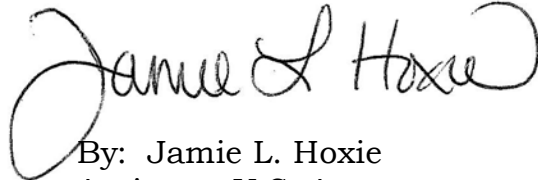
As discussed during the Court's May 6, 2020 status teleconference, the Government has provided defense counsel with substantial discovery, including well over 500,000 electronic records and a copy of the BitClub Network servers that were recovered in the investigation. The Government anticipates making another production of approximately 200,000 electronic records in the next few days. In addition, the parties continue to work through a process designed to reasonably protect the defendants' attorney-client privilege (the "Filter Process,") which the Government does not expect will be complete until July 15, 2020, at the earliest.

Under these circumstances, it will not be possible for trial to proceed prior to July 15, 2020 because the parties will still be completing the exchange and review of Rule 16 discovery. Accordingly, the Government submits that, given the complexity of the discovery in this case and the Filter Process, a continuance of the Speedy Trial deadlines through July 15, 2020 is necessary and appropriate.

Accordingly, the Government respectfully requests that the Court enter the proposed complex case and continuance order.

Respectfully submitted,

CRAIG CARPENITO
United States Attorney

A handwritten signature in black ink, reading "Jamie L. Hoxie". The signature is written in a cursive style with a large, looping initial "J" and "H".

By: Jamie L. Hoxie
Assistant U.S. Attorney